

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Christopher Watson and Plaintiff,
Intellectus, LLC,

- against -

Riptide Worldwide, Inc. et Defendant.
al.

11 cv 0874 (PC)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Megan J. Muoio a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: James E. Edwards
Firm Name: Ober Kaler
Address: 100 Light Street
City/State/Zip: Baltimore, Maryland 21202
Phone Number: (410) 685-1120
Fax Number: (410) 547-0699

James E. Edwards is a member in good standing of the Bar of the States of
Maryland

There are no pending disciplinary proceeding against James E. Edwards
in any State or Federal court.

Dated: 4/21/2011

City, State: New York, New York

Respectfully submitted,

Sponsor's

SDNY Bar JM-6121

Firm Name: Allyn & Fortuna LLP

Address: 200 Madison Avenue, 5th Floor

City/State/Zip: New York, NY 10016

Phone Number: (212) 213-8844

Fax Number: (212) 213-3318

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
	:	
CHRISTOPHER WATSON and	:	
INTELLECTUS, LLC,	:	
	:	11-CV-0874 (PAC)
Plaintiffs,	:	
	:	AFFIDAVIT OF MEGAN
-against-	:	J. MUOIO IN SUPPORT OF
	:	MOTION TO ADMIT
	:	<u>COUNSEL <i>PRO HAC VICE</i></u>
RIPTIDE WORLDWIDE, INC. (f/k/a Shea	:	
Development Corp.), FRANCIS E. WILDE,	:	
TOMMY E. WHEELER, JOSEPH VITETTA,	:	
RICHARD CONNELLY and PHILIP E.	:	
LOEFFEL,	:	
	:	
Defendants.	:	
	X	

State of New York)
) ss:
County of New York)

MEGAN J. MUOIO, being duly sworn, hereby deposes and says as follows:

1. I am associated with Allyn & Fortuna, LLP, counsel for Plaintiffs Christopher Watson and Intellectus, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this Affidavit based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit James E. Edwards as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member of good standing of the bar of the State of New York, and was admitted to practice law on January 26, 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known James E. Edwards since November 2009.

4. Mr. Edwards is a principal of Ober Kaler in Baltimore, Maryland. He is a member in good standing of the Bar of the State of Maryland. A Certificate of Good Standing from Maryland is annexed hereto as Exhibit A.

5. I have found Mr. Edwards to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

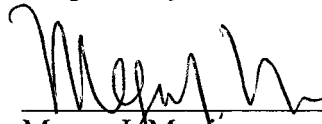
6. Accordingly, I am pleased to move the admission of James E. Edwards, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of James E. Edwards, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit James E. Edwards, *pro hac vice*, to represent the Plaintiffs in the above captioned matter, be granted.

Dated: April 20, 2011
New York, New York

Respectfully submitted,



Megan J. Muolo
SNDY Bar Code: JM-6121

Sworn To Before Me This
20th day of April, 2011

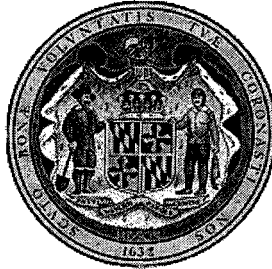


Notary Public

ANDREA PLATNER HELLMAN
Notary Public, State of New York
No. 02HE5068712
Qualified in New York County
Commission Expires Nov 4, 2014

12/28/14

**Court of Appeals
of Maryland**
Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the ninth day of December, 1982,*

James Ernest Edwards, Jr.

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
seventh day of April, 2011.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Christopher Watson and
Intellectus, LLC,

Plaintiff,

- against -

Riptide Worldwide, Inc. et al.

Defendant.

11 cv 0874 (PAC)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Megan J. Muoio attorney for Christopher Watson and Intellectus, LLC
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: James E. Edwards
Firm Name: Ober Kaler
Address: 100 Light Street
City/State/Zip: Baltimore, Maryland 21202
Telephone/Fax: (410) 685-1120
Email Address: 410-547-0699

is admitted to practice pro hac vice as counsel for Christopher Watson and Intellectus, LL in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 : SS :
COUNTY OF NEW YORK)

Anna Roman, being duly sworn, deposes and says:

On April 20, 2011, I served the annexed **MOTION TO ADMIT JAMES E. EDWARDS PRO HAC VICE** on the attorney(s) and/or parties named below by depositing a true copy in a postage-paid, properly addressed envelope into the care of the United States Postal Service at the postal box located at 200 Madison Avenue, New York, New York 10016. Postal service directed as follows:

Teresa M. Cinnamond, Esq.
Carroll, McNulty & Kull LLC
120 Mountain View Boulevard
Post Office Box 650
Basking Ridge, NJ 07920

Rick Castello, Esq.
Shaub, Ahmuty, Citrin & Spratt, LLP
655 Third Avenue
New York, NY 10017

Francis E. Wilde
316 Ridgehaven Place
Richardson, TX 75080

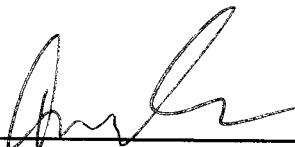
Tommy E. Wheeler
13846 Atlantic Blvd, #404
Jacksonville, FL 32225

Riptide Worldwide Inc.
c/o Shea Development Corp
1859 Whitney Mesa Drive
Henderson, NV 89014

Joseph E. Vitetta, Jr.
260 Ambleside Chase
Alpharetta, GA 30022

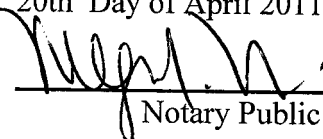
Such being the address previously designated for that purpose in the preceding papers in this action. Such service was done in full compliance with Rule FRCP 5(b). I am over 18 years old.

Dated: New York, New York
April 20, 2011



Anna Roman

Sworn To Before Me This
20th Day of April 2011



Notary Public

